

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION

UNITED STATES OF AMERICA

v.

APPROXIMATELY \$16,761 IN UNITED  
STATES CURRENCY SEIZED FROM  
JERMAINE LYDELL SANDERS ON  
NOVEMBER 16, 2020, IN  
MOORESVILLE, NORTH CAROLINA.

CIVIL NO. 5:21-cv-00053

**UNITED STATES' RESPONSE REGARDING MOTION FOR LEAVE  
TO APPEAR PRO HAC VICE AS TO STEPHEN SILVERMAN**

NOW COMES the United States of America, by and through William T. Stetzer, Acting United States Attorney for the Western District of North Carolina, and notifies the Court as follows regarding the above-referenced pro hac vice motion:

1. On March 30, 2021, Maria T. Perry filed a motion for admission pro hac vice and affidavit, moving for the admission of Stephen Silverman to represent “Jermaine Sanders and approximately \$16,761 in United States Currency, referenced in the Complaint filed.” (the “Motion”).

2. In signing the Motion, both Local Counsel and the Applicant certified, *inter alia*, that “Local Counsel has conferred with counsel for the other parties, who have indicated they do not oppose this motion.” Doc. 3, at ¶ 8.

3. Counsel for the other parties (*i.e.*, the two undersigned AUSAs representing Plaintiff the United States), have neither communicated with Local Counsel or Applicant in any manner, nor indicated to them a position on the Motion.

4. The United States takes no position on the Motion other than to note that, while a Claimant typically is represented by counsel in a civil forfeiture case, a Defendant property *in rem* typically is not represented by counsel in a civil forfeiture case, nor is the undersigned aware of case-law permitting representation of a piece of property in such cases.

Respectfully submitted this 30th day of March, 2021.

WILLIAM T. STETZER  
ACTING UNITED STATES ATTORNEY

**/s/ J. Seth Johnson**  
NC Bar No. 53217  
**/s/ Benjamin Bain-Creed**  
Florida Bar No. 21436  
Assistant United States Attorneys  
227 West Trade Street, Suite 1650  
Charlotte, North Carolina 28202  
Telephone: (704) 344-6222  
Email: seth.johnson@usdoj.gov  
Email: benjamin.bain-creed@usdoj.gov